



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866**

VIA ELECTRONIC DELIVERY

October 27, 2016

Dr. Javier Quintana
Executive Director
Puerto Rico Electric Power Authority
P.O Box 364267
San Juan, PR 00936

Re: Fibers Public Supply Wells Superfund Site, Guayama, Puerto Rico

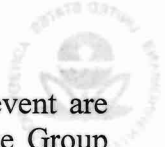
Dear Dr. Quintana,

As you know, a meeting was held between the Puerto Rico Electric Power Authority (PREPA), the Puerto Rico Aqueduct and Sewer Authority (PRASA), the Puerto Rico Environmental Quality Board, the Puerto Rico Department of Natural and Environmental Resources and the U.S. Environmental Protection Agency (EPA) on May 17, 2016, to further discuss the utilization of the Patillas Canal to accept the treated water from the Fibers Public Supply Wells Superfund Site Treatment System. At the meeting, PREPA indicated its concern related to the quality of the treated water. Specifically, PREPA provided a comparison analysis table that purported to show pesticides in the treated water at concentrations higher than the 1990 Puerto Rico Water Quality Standards (1990 PRWQS) for surface water, and silver and selenium concentrations at levels also above those standards.

The metals concentrations set forth in the comparison analysis table provided to EPA are inaccurate. The comparison analysis table appears to be inconsistent with Table 1-2 from the July 2011 report prepared by Arcadis, the Fibers Group's consultant, entitled, "Evaluation of Treated Groundwater Discharge Alternatives." Please find an excerpt from that report included for your reference. As you will see in the excerpt, Table 1-2 qualifies the silver and selenium data with a "U" designation, which indicates that the metals were undetected. Therefore, the characterization that these constituents are noncompliant with the 1990 PRWQS is not supported. Such "U" designations for silver and selenium are absent from your comparison analysis table, which could mislead one to conclude that there are actual detections at the levels set forth in the table.

The comparison analysis table provided by PREPA also indicates that the pesticide levels in the treated water are noncompliant with 1990 PRWQS. The pesticides are marked with a "U" designation in the comparison analysis table, which again signifies that these pesticides were undetected in the treated water.

Lastly, in July of this year, EPA tasked the Fibers Group consultant to sample the influent and



the effluent from the new treatment system at the site. The results of this sampling event are documented in the attached August 2016 Arcardis sampling report and the Fibers Site Group monthly RD/RA report to EPA. The sampling data set forth in these two documents demonstrates that the effluent water from the treatment system at the site is in compliance with the 1990 PRWQS, as required by the 1991 Record of Decision for the site.

As such, EPA considers the discharge of the treated water to the Patillas Canal to be a viable alternative for beneficial use of the groundwater at the site and intends to engage the Fibers Group to discuss moving forward with this alternative. If you have any comments or questions, please contact me or Dr. Adalberto Bosque, Remedial Project Manager, at (787) 977-5825.

Sincerely,

Walter Mugdan, Director
Emergency and Remedial Response Division

Enclosures (3)